

Serial No. 10/075,422

## REMARKS

As a result of the present amendment, claims 8-13 remain pending in the application (1 independent claim, 6 total claims). No new matter has been added by this Amendment. Reconsideration is respectfully requested in light of the following remarks.

### Claim Rejections - 35 U.S.C. §102

Claims 8-12 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent Application Publication 20010020735 A1, Chikawa et al. Applicants respectfully submit that the Chikawa does not disclose each and every element of the claims as amended.

For example, the top view and cross-sectional figures 2 and 3 of Chikawa show that no part of the metal traces (e.g., what are referred to as "wires" 6c) lies directly beneath IC chip 4. Referring to Fig. 3 of Chikawa, die 24 attaches to interposer layer 26 but the bond pads and rewiring layers 26a, 26b, 23a are all outside the perimeter of die 24.

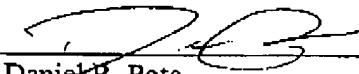
Therefore, Chikawa does not disclose a configuration wherein at least a portion of the conductive trace lie "directly underneath . . . said second semiconductor device" as recited in claim 8. Chikawa does not disclose that such metal traces might be necessary, topologically, to prevent crossing of wires in complicated circuitry. Furthermore, the conductive traces of Chikawa are not "insulated from" an overlying die as recited by the claims as amended.

Accordingly, Applicants respectfully request that the Section 102 rejections be withdrawn.

Serial No. 10/075,422

**Conclusion**

In view of the foregoing Amendment and Remarks, Applicants respectfully submit that the present application is in condition for allowance, and earnestly solicit a Notice of Allowance at the Examiner's earliest convenience. The Examiner is invited to telephone the undersigned if such would advance prosecution of this Application in any way.

Date: 2/7/05By: 

Daniel R. Pote  
U.S. Reg. No. 43,011

**SNELL & WILMER L.L.P.**  
One Arizona Center  
Phoenix, AZ 85004-2202  
Phone: (602) 382-6325  
Fax: (602) 382-6070  
[dpote@swlaw.com](mailto:dpote@swlaw.com)